

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST, *et. al.*  
individually and on behalf of a class of all others  
similarly situated;

*Plaintiffs,*

- vs -

**Case No. 1:18-cv-00719-CCR**  
**JUDGE REISS**

CITY OF BUFFALO, N.Y., *et. al.*

*Defendants.*  
-----X

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Rule 83.2(c) of the Local Rules of the United States District Court for the Western District of New York, Plaintiffs Black Love Resists in the Rust (“Black Love Resists” or “BLRR”) and individual plaintiffs and class representatives, Dorethea Franklin, Taniqua Simmons, De’Jon Hall, Shaketa Redden, Jane Doe, Joseph Bonds, Charles Palmer, Shirley Sarmiento, and Ebony Yeldon, by and through counsel, respectfully move the Court to allow Marc Cohan, Esq. to withdraw as counsel of record in the above-captioned proceeding. Mr. Cohan is no longer affiliated with the National Center for Law and Economic Justice (NCLEJ). No party will be prejudiced or otherwise affected by his withdrawal, as Claudia Wilner and Edward Krugman, both of whom remain associated with NCLEJ, will remain as counsel for plaintiffs, in addition to co-counsel from the Center for Constitutional Rights, and the Western New York Law Center. Counsel for Defendant does not object to the relief sought by this motion.

Dated: March 19, 2021

Respectfully submitted,

/s/ Britney Wilson

Britney R. Wilson

NATIONAL CENTER FOR LAW  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2021, a true and correct copy of the foregoing document was served on the following via electronic mail:

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Dated: March 19, 2021

/s/ Britney Wilson  
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